

## **EXHIBIT 3**

Bryson, Santana and Joshua v. Rough Country, LLC

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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
GAINESVILLE DIVISION

SANTANA BRYSON and JOSHUA )  
BRYSON, as adminsitrators of )  
the Estate of C.Z.B. and as )  
surviving parents of C.Z.B., a )  
deceased minor., )  
PLAINTIFF, )  
VS. ) CASE NO.: 2:22=CV=017-RWS  
ROUGH COUNTRY LLC, )  
DEFENDANT. )  
\_\_\_\_\_ )

REPORTER'S TRANSCRIPT OF PROCEEDINGS  
FRIDAY, MAY 5, 2024

APPEARANCES:

FOR THE PLAINTIFF:

CANNELLAS NYDER

BY: Tedra Cannella

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(Appearances continued next page.)

REPORTED BY: JUSTUS BALENTINE, CSR 13859

1 an auto manufacturer?

2 A. I have never been hired in such a case because I  
3 would be conflicted out and because generally the defense  
4 lawyers are the ones who call is.

5 Q. So you've never testified for a plaintiff  
6 against an auto manufacturer; correct?

7 A. Correct. Not like a car manufacturer. The  
8 products that I almost testified about and then didn't  
9 was tree trimming equipment that moved on its own, so  
10 technically it's an automobile, but Ford, Chrysler,  
11 Toyota, that sort of thing.

12 Q. Have you ever testified that a product caused  
13 death or injury?

14 A. That would be something that I wouldn't really  
15 testify about one way or the other because that would be  
16 more of sort of a design thing or a defect thing, which I  
17 never -- I have no opinions about, but I've certainly  
18 testified that people have died in car crashes or have  
19 been injured in car crashes due to, you know, interaction  
20 with part of the car, part of the vehicle, et cetera.

21 Q. So you've never testified that a person was not  
22 killed or injured by a product?

23 MR. HILL: Object to the form.

24 MS. CANNELLA: Yeah. That was kind of  
25 confusing.

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1 STATE OF CALIFORNIA )  
2 ) ss.  
3 COUNTY OF ALAMEDA )  
4  
5

6 I, JUSTUS BALENTINE, Certified Shorthand  
7 Reporter No. 13859, hereby certify that the foregoing  
8 proceeding was taken by me at the time and place herein  
9 set forth;

10 That the said proceeding was taken down by me  
11 in shorthand and thereafter transcribed under my  
12 direction and supervision, and I hereby certify the  
13 foregoing proceeding is a full, true, and correct  
14 transcript of my shorthand notes so taken;

15 That dismantling this transcript will void the  
16 certification by the Certified Shorthand Reporter.

17 I further certify that I am neither counsel for  
18 nor am I in any way related to any party to said action,  
19 nor am I in any way interested in the outcome thereof.

20 IN WITNESS WHEREOF, I have subscribed my name  
21 this 17th day of June, 2024.

22  
23   
24

25 JUSTUS BALENTINE, CSR NO. 13859